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Attorneys for Plaintiff

MONICA RANGER individually and
on behalf of those similarly situated

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

MONICA RANGER, individually and on
behalf of all those similarly situated,

Plaintiff,

vs.

SHARED IMAGING, a Limited Liability
Company and DOES 1 THROUGH 100,
inclusive,

Defendants.

Case No. 2:20-cv-00401-KJM-KJN

CLASS ACTION

**STIPULATION AND ORDER STAYING
MATTER PENDING PRELIMINARY
AND FINAL APPROVAL OF CLASS
ACTION/PAGA SETTLEMENT**

Complaint filed: January 20, 2020

Trial date: Not set

Pursuant to Eastern District of California Local Rule 143, Plaintiff Monica Ranger (“Plaintiff”) and Defendant Shared Imaging, LLC (“Defendant”), by and through the undersigned counsel, hereby stipulate as follows:

WHEREAS Plaintiff and Defendant (collectively “the Parties”) have reached an agreement in principle to settle this wage and hour class and PAGA Action, the essential terms of which are set forth in the Parties’ fully-endorsed Memorandum of Understanding;

WHEREAS, the Parties are in the process of finalizing a joint stipulation for class action and PAGA settlement, and in the interim stipulate that the Court may enter an order as follows:

1. All proceedings, including deadlines to complete discovery and expert discovery, in this action are stayed for 120 days from the date this Order is executed;

2. The parties are to execute a settlement agreement reflecting their agreement in principle to settle this wage and hour class action and PAGA action as soon as practicable, but in any event within 120 days from the date this Order is executed;

3. Plaintiff is to move for preliminary approval of the class action settlement as soon as practicable, but in any event within 120 days from the date this order is executed;

4. Should the Parties fail to execute a settlement agreement within 120 days from the date this Order is executed, the Parties shall file a joint statement showing cause why the stay should not be lifted.

Respectfully Submitted,

Dated: November 11, 2021

DARREN GUEZ LAW FIRM

/s/ Darren Guez

Darren Guez, Esq.

Attorney for Plaintiff

Dated: November 11, 2021

/s/ Natalie B. Fujikawa

Natalie B. Fujikawa

Attorney for Defendant

ORDER

Having read and considered the Parties' Stipulation to stay proceedings in this matter in light of agreement in principle to settle this case, the facts upon which the request is based, and good cause appearing, it is ORDERED as follows:

1. All proceedings are stayed for 120 days from the date this Order is executed. If a Motion for Preliminary Approval of Class Action Settlement is not on file by this date, the Parties shall file a joint statement showing cause why the stay should not be lifted.

DATED: November 12, 2021.



CHIEF UNITED STATES DISTRICT JUDGE